

DEPARTMENT OF AGRICULTURE

ANIMAL PLANT HEALTH INSPECTION SERVICE

Docket No. 05-015-1

National Animal Identification System

Notice of Availability of a:

Draft Strategic Plan and Program Standards

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Comments from the Wisconsin Department of Agriculture, Trade and Consumer  
Protection

RE: Docket No. 05-015-1  
National Animal Identification System  
Draft Strategic Plan and Program Standards

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Thank you for the opportunity to submit comments regarding the National Identification System (NAIS) Draft Strategic Plan and Program Standards.

The Department supports the overall objectives of the NAIS and the Program Standards to:

- ☐ Establish a uniform national standard for uniquely identifying locations that produce, manage, and hold livestock.
- ☐ Establish a uniform national standard for uniquely identifying individual animals and a group or lot of animals as they move through the marketing chain.
- ☐ Establish a uniform national standard data management system for recording the movements of individual and lots of animals at change of ownership, interstate movement, and commingling with other owners livestock.
- ☐ Establish the ability to trace a diseased animal of concern from point of diagnosis through the marketing chain to herd of origin within 48 hours.

The Department supports the five guiding principles of the Draft Strategic Plan and the Program standards establishing:

- ☐ Uniform data standards throughout the U.S. supporting premises registration, animal identification, and animal tracking.
- ☐ Coordination of NAIS with production management systems and marketing incentives.
- ☐ Mandated implementation for all livestock species.
- ☐ Cooperative efforts by industry and government to achieve 48 hour traceback.
- ☐ Secured, reliable and confidential information.

## Topics of Interest and Answers to Specific Questions

### Does NAIS need to be mandatory

Yes. WI encourages the USDA to commit to full implementation of the program by January, 2009 as outlined in the plan. We support individual components of the plan being made mandatory prior to January 2009 as outlined in the strategic plan. We encourage USDA to consider moving up the mandatory time-table for implementation by requiring premises registration and animal identification at herds/flocks of origin by January 1, 2007. Identification at origin provides a necessary “bookend” for disease traceability. The other “bookend” comes at the time of disease detection either at ante mortem or post-mortem inspection at harvest or other production location. Placement of the “bookends” into the NAIS as an initial first step can be accomplished in a short period of time at less expense to industry and government compared to the proposed NAIS initiative to report all changes of ownership that may occur between the bookends. While the “bookend” step may not always meet the 48 hour traceback goal, it will significantly improve the current disease traceability timetable in the U.S. and be reflective of other animal identification systems accepted by international trading partners.

A mandatory program requires that a time-tested infrastructure to support the program is in place. We encourage APHIS to seek additional, adequate federal funding to support technology and infrastructure development and testing.

### Compliance for Identification

We support mandatory identification of livestock prior to moving into commerce or to commingled events. Markets and/or exhibitions and other commingled events should have the ability to offer identification services to producers. Compliance and enforcement rules and regulations should be written and enforced by state animal health officials. Markets, exhibitions and other commingled events should have the option to refuse livestock not identified, but compliance authority should rest with state and federal animal health authorities.

### Tagging Sites

The Department supports establishing tagging sites. Any entity should be allowed to offer identification services. Sites will need to comply with USDA and state requirements for administering AIN ID devices and must agree to meet the reporting requirements outlined in the NAIS.

### Compliance/Recording of Direct Sales

The Department supports the proposal that the receiving premises is the entity ultimately responsible for reporting the movement. State-licensed livestock dealers could be forced to report movements as a condition of their license. In the case of direct or private treaty sales, both the seller and the buyer should be encouraged to report the

movement. This self-policing cross check will ensure for the seller and the buyer, that health authorities would have access to the official record noting the day their respective responsibility stopped / started. The NAIS Animal Tracking System should accommodate the listing of name and address, since in most cases the buyer and seller would not share premises numbers.

To ensure producers selling and buying livestock comply there should be various options available to report animal movement. This can be achieved through internet based state systems, industry groups (DHIA's breed registries, any other third party service provider), or on paper forms. A national standard format for paper for paper forms should be established.

### Age to Identify Animals

We support identifying animals at change of ownership, interstate movements, and commingling of animals by multiple owners. Producers should be given the latitude to decide on identification prior to the above.

### NAIS Timelines

We support the proposed mandate of January 2009. We encourage USDA to accelerate the time-table for implementation by requiring premises registration and animal identification at herds / flocks of origin by January 1, 2007. We also encourage USDA to seek additional funding for implementation, infrastructure, application development and testing.

### Species Timelines

There should not be any exemptions in regards to compliance of species groups to certain components of the NAIS. For example all livestock species must register a premises by the same mandatory date. Setting different timelines will create confusion with industry and producers in regards to implementation and does not support the uniform goal of a system with 48-hour traceback capabilities.

### Data Submission

Electronic data submission is the most cost and labor efficient however, to ensure all producers, markets, exhibitions, and processing facilities have the ability to participate, all venues for data submission should be allowed. This includes direct internet based data entry, paper submission, herd management software, or producers working through third party data providers.

Wisconsin piloted various venues and means for premises registration. Producers can register themselves directly online, fill in a paper form, work through approved third party service provider, and register through on-line PCs in county FSA offices. A state data collection infra-structure that addresses regional needs and allows for various options for data entry has proven to be very efficient and achieve the maximum amount of buy-in from stakeholders.

### Confidentiality

The Department supports all information contained in the NAIS be protected from disclosure. The sole purpose of the NAIS is to enhance the U.S. disease surveillance and monitoring system. The animal tracking component promises to provide animal health authorities the opportunity to significantly improve their ability to prevent and control disease outbreaks. The same data set given access to the public could be used to implement a biological terrorist attack.

#### Methods for Submitting Data

We encourage the direct electronic transfer of as much data as possible. We support and encourage producers, markets, abattoirs, breed associations, and third-party data managers have the ability to submit animal movement data to the animal tracking system. However, producers, markets, exhibitions, and processing facilities must all have the ability to participate and there will be a continued need for alternate submission venues including paper submissions.

#### Privately Managed Database

The proposed NAIS infra-structure allows for USDA and states to contract with private database managers. The Wisconsin Department of Agriculture, Trade and Consumer Protection contracted with Wisconsin Livestock Identification Consortium (WLIC) to manage the state premises and animal ID database. Although WLIC is maintaining a privately managed database, the authority for collecting and storing premises and animal identification and data ownership resides with the State Department. Premises registration and animal movement information is accessible to state and federal animal health officials at all times. To meet the 48-hour traceback objective and maintain international credibility any national privately managed database must meet USDA's standards and under the authority and oversight of USDA, with industry input. Data must be accessible to USDA and state animal health officials at all times.

#### Funding

Wisconsin producers and legislators have voiced strong feelings that the financial burden for implementing the NAIS should not be shouldered by the producers. A public, private partnership, including government, industry, consumers and producers is the best solution. Producers have raised concerns that a privately managed database system without government oversight has potential to lead to excessive fees passed back to the producer with no offset for these added costs. Under a publicly held system it is expected that these costs would be shared with the consumers, industry and government. We encourage USDA to secure adequate long term funding, (beyond the \$33 million), for states and USDA to implement and administer the NAIS.

#### Multiple Systems

Multiple national animal ID databases broken out by species would make compliance cumbersome and risk that the 48-hour traceback goal cannot be met. Producers or stakeholders managing different species should not be asked to submit data to multiple locations to comply with NAIS. The proposed information system infra-structure for one single national animal ID database which is supported by state databases and third party

data providers is the most cost effective and efficient infra-structure method to achieve maximum compliance and address regional (state) differences.

The reporting of animal movement information (premises of origin, premises of destination, animal identification, and the date of transaction / movement) should be state controlled and coordinated through the proposed NAIS Animal Tracking System. Such a system will provide large and small producers an easy one step, cost effective choice in meeting the reporting requirements of the NAIS. In order for the state / federal veterinary infrastructure to respond to an animal disease outbreak or threat in a timely manner, the state veterinarian must be able to go to a central data system and bring up the record of all movements for the animal in question.

#### State Level

The question of who manages the national animal ID database has had much debate; however, very little focus is placed on the task of collecting the data. Data collection is the task that will be hardest and most expensive to accomplish, it also cannot be separated from the database management issue. Stakeholders are very concerned in regards to the technology and costs associated with data collection. Due to regulatory differences (branding, non-branding, etc.) the current design of the data collection infrastructure that includes state managed databases must be maintained either under a public, or privately managed national animal ID database.

#### Technology Neutral

The Department supports the NAIS Cattle Industry Working Group recommendation for the individual identification of all cattle, utilizing ISO-compliant Radio Frequency Identification Device (RFID) ear tags as the standard for implementing the NAIS in the U.S. cattle industry. The technology neutral stance does not provide guidance or incentive in the market place for direction on infrastructure development. Technology neutral dictates that producers, marketing agents and packing plant managers must have all forms of ID equipment available just in case an animal shows up with a varying type of ID device. Technology neutral adds expense not effectiveness to the program.

To maintain continuity of animal disease programs and reporting animal tracking data to the NAIS, we support the use of RFID technology in all livestock species as deemed effective and appropriate by the NAIS Species Working Groups.

Thank you for the opportunity to submit these comments and participate in the process.